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**BY ECF**

August 4, 2014

The Honorable John Gleeson  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Agron Hasbajrami*  
Criminal Docket No. 11-cr-623 (JG)  
Civil Docket No. 13-cv-6852 (JG)

Dear Judge Gleeson:

For the reasons set forth below, I write to request that the Court modify the current scheduling order.

As ordered on July 17, 2014, the government's opposition shall be filed by August 8, 2014; Hasbajrami's reply, if any, shall be filed by August 18, 2014, and argument on the motion is scheduled for August 22, at 10:30am.

On August 22, 2014, both counsel for the defendant/petitioner will not be in the Country. The parties have discussed another date that all of us will be available for argument on the motion and have agreed upon September 12, 2014. This date is also one that is open on the Court's calendar.

I have discussed this request with the attorney for the government, Seth DuCharme, and he advises me that he does not object. Accordingly, we respectfully request that the proposed amended scheduling order be adopted by the Court

Thank you for your consideration in this matter.

Respectfully submitted,

*Steve Zissou*

Steve Zissou

cc: Seth Ducharme, AUSA